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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**PLAINTIFFS' NOTICE OF RELATED
CASES**

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Background

Plaintiffs filed the instant case on July 7, 2025. On the Civil Cover Sheet, Plaintiffs identified two related cases in this district: *National TPS Alliance, et al. v. Kristi Noem, et al.*, No. 3:25-cv-01766 and *Ramos, et al. v. Nielsen, et al.*, No. 3:18-cv-1554. Dkt. 1-1.

Pursuant to Local Rule 3-12(b), Plaintiffs simultaneously filed in *Ramos v. Nielsen* (the lowest-numbered case) an Administrative Motion to Consider Whether Cases Should be Related. *Ramos*, Dkt. 264.

On July 8, 2025, this Court ordered Plaintiffs to provide the Court with notice of any related cases that are pending in federal court no later than July 11, 2025. Dkt. 27.

On July 9, 2025, this Court referred this case to the Honorable Edward M. Chen for consideration of whether this case is related to *National TPS Alliance, et. al., v. Trump, et. al.*, Case No. 3:25-cv-01766-EMC (N.D. Cal. filed February 19, 2025).

On July 11, 2025, Judge Chen denied Plaintiffs' Motion to Consider Whether Cases Should be Related. *Ramos*, Dkt. 267.

Pursuant to this Court's July 8, 2025 Order, Dkt. 27, Plaintiffs hereby file this notice to provide the Court with notice of any related cases that are pending in federal court.

Related Cases

Plaintiffs in this case challenge unlawful decisions to end Temporary Protected Status protections in violation of the Administrative Procedure Act (APA) and the Fifth Amendment of the United States Constitution. Plaintiffs allege that Defendants have made a preordained, political decision to terminate TPS designations wholesale, and that the terminations of TPS for Honduras, Nepal, and Nicaragua were based on this preordained decision rather than the objective country conditions review required by statute. *See* Complaint, Dkt. 1 ¶¶ 152-57.

In addition to *National TPS Alliance, et al. v. Kristi Noem, et al.*, No. 3:25-cv-01766 and *Ramos, et al. v. Nielsen, et al.*, No. 3:18-cv-1554, Plaintiffs are aware of the following pending cases outside of this district that raise APA and/or Fifth Amendment challenges to Defendants' TPS decisions:

- *HECA, et. al., v. Trump, et. al.*, Case No: 1:25-cv-01464 (E.D.N.Y. filed March 14, 2025)

- (challenging vacatur and termination of TPS for Haiti)
- *Haitian Americans United, et. al. v. Trump, et. al.*, Case No: 1:25-cv-10498 (D. Mass filed March 3, 2025) (challenging vacatur and termination of TPS for Haiti and Venezuela)
 - *CASA, et. al. v. Noem, et. al.*, Case No 8:25-cv-00525-GLR (D. Md. filed March 3, 2025) (challenging vacatur and termination of TPS for Venezuela)
 - *CASA, et. al. v. Noem, et. al.*, Case No. 8:25-cv-1484 (D. Md. filed May 7, 2025) (challenging termination of TPS for Cameroon and Afghanistan).¹

Date: July 11, 2025

Respectfully submitted,

NATIONAL DAY LABORER ORGANIZING
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/s/ Jessica Karp Bansal
Jessica Karp Bansal

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Attorneys for Plaintiffs

¹ This list does not include cases filed to challenge TPS terminations during the first Trump Administration, as those cases are no longer pending. The sole exception is *Ramos*, which remains pending because the court has yet to resolve the parties' dispute over attorneys' fees.

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

NATIONAL DAY LABORER ORGANIZING
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/s/ Jessica Karp Bansal

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